



# INDUSTRY CIRCULAR

DEPARTMENT OF  
THE TREASURY

Bureau of Alcohol, Tobacco and Firearms  
Washington, D.C. 20226

Number: 80-4

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## ALTERNATE APPROVAL PROCEDURES FOR DISTINCTIVE LIQUOR BOTTLES

Proprietors of distilled spirits plants, liquor bottle manufacturers, importers, and others concerned:

**PURPOSE.** The purpose of this circular is to inform industry members and others concerned that an ATF Ruling which liberalizes distinctive liquor bottle approval procedures will be published in the April - June quarterly issue of the Alcohol, Tobacco and Firearms Bulletin. This ruling will read substantially as follows:

The Bureau has been requested to allow the approval of distinctive liquor bottles as part of the label approval process, and thereby reduce costs to permittees.

Regulations in 27 CFR 19.62, 250.331, and 251.221 allow the Director to approve alternate methods or procedures subject to stated conditions, when he finds that:

1. Good cause has been shown for the use of the alternate method or procedure;
2. The alternate method or procedure is within the purpose of, and consistent with the effect intended by the specifically prescribed method or procedure, and affords equivalent security to the revenue; and
3. The alternate method or procedure will not be contrary to any provision of law, and will not result in an increase in cost to the Government or hinder the effective administration of these parts.

The regulations appearing at 27 CFR 19.634, 250.314, and 251.204, require submission of a letter application accompanied by an actual bottle or an authentic model if the bottle has not previously been declared distinctive.

The Bureau finds that the applicant may, as an alternative, certify as to the total capacity of a representative sample bottle before closure (expressed in milliliters) on Forms 1649 in lieu of submitting the actual bottle or model required by regulations. In addition, the Bureau has determined that affixing a readily

legible photograph (both front and back of the bottle) to the front of each copy of Form 1649, along with the label(s) to be used on the bottle, will be sufficient in most instances to allow the approval of distinctive liquor bottles as part of the label approval process.

HELD, bottlers and importers desiring approval of distinctive liquor bottles without submitting an actual specimen bottle or an authentic model (unless specifically requested) may, as an alternative, certify as to the total capacity of a representative sample bottle before closure (expressed in milliliters) on Forms 1649, accompanied by both the labels to be used with the bottle, and a readily legible photograph (both front and back) of the bottle, affixed to the front of the forms.

INQUIRIES: Inquiries concerning this circular should be referred to its number and be addressed to the Assistant Director (Regulatory Enforcement), Bureau of Alcohol, Tobacco and Firearms, 1200 Pennsylvania Avenue, NW, Washington, DC 20226.

*G. R. Dickerson*  
Director

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